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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 MAURICE SULLIVAN, an individual.)

10 Plaintiff,)

11 v.)

12 GOVERNMENT EMPLOYEES INSURANCE)
COMPANY d/b/a GEICO ADVANTAGE)
13 INSURANCE COMPANY d/b/a GEICO)
CASUALTY COMPANY, a foreign corporation;)
14 DOEX 1-X, and ROES XI-XX.)

15 Defendants.)
16)
17)
18)

CASE NO.: 2:19-cv-01378-RFB-BNW

STIPULATION AND ORDER TO EXTEND
DEADLINE TO FILE RESPONSE (FIRST
REQUEST)

19 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Maurice Sullivan,
20 by and through his counsel, the LBC Law Group, and Defendants, Government Employees
21 Insurance Company d/b/a Geico Advantage Insurance Company d/b/a Geico Casualty Company
22 ("Defendants"), by and through their counsel, Wade M. Hansard, Esq. of McCormick, Barstow,
23 Sheppard, Wayte & Carruth LLP, as follows:

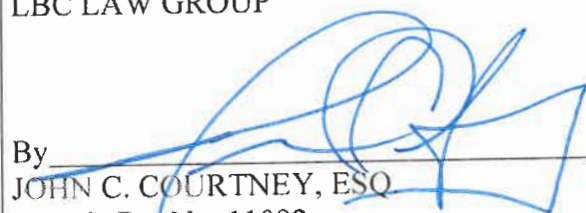
24 IT IS HEREBY STIPULATED AND AGREED that the deadline for Plaintiff to file his
25 Opposition to Defendant's Motion to Dismiss, or in the alternative, to Sever/Bifurcate and to Stay
26 Claims for Bad Faith ("Opposition"), which is currently due on September 3, 2019, be extended to
27 September 10, 2019. Plaintiff requests this extension of time due to his counsel's unforeseen
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1 scheduling conflicts which render timely completion of the Opposition untenable. This is the first
2 stipulation for extension of time to file an Opposition to the aforementioned motion. This stipulation
3 is brought in good faith and not for the purpose of delay.

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5 IT IS SO STIPULATED.

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7 Dated this 3rd day of September, 2019.

8 LBC LAW GROUP

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11 By 
12 JOHN C. COURTNEY, ESQ.
13 Nevada Bar No. 11092
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19 info@lbclawgroup.com
20 Attorneys for Plaintiff

Dated this 3rd day of September, 2019.

MCCORMICK, BARSTOW, SHEPPARD
WAYTE & CARRUTH LLP

By: /s/ Wade M. Hansard
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*Attorneys for GEICO ADVANTAGE
erroneously sued and served herein as
GOVERNMENT EMPLOYEES INSURANCE
COMPANY d/b/a GEICO ADVANTAGE
INSURANCE COMPANY d/b/a GEICO
CASUALTY COMPANY*

1 ORDER

2 *Based on the Stipulation of the Parties and good cause otherwise appearing, the Court,*
3 *hereby Orders the following:*

4 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the deadline for Plaintiff's
5 to file their Opposition to Defendant's Motion to Dismiss, or in the alternative, to Sever/Bifurcate
6 and to Stay Claims for Bad Faith ("Opposition"), which is currently due on September 3, 2019, be
7 extended to September 10, 2019.

8 IT IS SO ORDERED this ____ day of _____, 20____

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10 
11 RICHARD F. BOULWARE, II
12 UNITED STATES DISTRICT JUDGE

13 DATED this 4th day of September, 2019.
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